

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA)	
)	
v.)	1:14CR39-5
)	
KENNETH W. WHITE)	

**MOTION FOR ADDITIONAL TIME TO RESPOND AND/OR FILE
OBJECTIONS TO PRESENTENCE REPORT**

NOW COMES counsel for the Defendant, KENNETH W. WHITE, through counsel and hereby moves the Court for additional time to file responsive pleadings to the presentence report.

In support of said motion, counsel shows the Court:

1. Responsive pleadings to the presentence report are due September 17, 2015.
2. Counsel has reviewed the presentence report with Mr. White, and has notified the United State Probation Officer and the Government of numerous objections to the PSR.
3. Counsel is in need of an extension to try to resolve the objections, and if unsuccessful, draft and file pleadings.
4. The undersigned has discussed this motion with Assistant United States Attorney Frank Chut, who has no objection.

Wherefore the undersigned respectfully requests that the Court extend the time to file responsive pleadings to the presentence report until September 24, 2015.

Respectfully submitted, September 15, 2015.

/s/ Lisa S. Costner

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I hereby certify that on September 15, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Frank J. Chut, Jr.
Assistant United States Attorney

And that I have served the following by email:
Assistant United States Probation Officer, Odessa Baker

Respectfully Submitted,

/s/ Lisa S Costner

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